

IDAHO DEPARTMENT OF ENVIRONMENTAL QUALITY

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Contents

	, 1
1.0 Introduction	2
2.0 Process Description	. 2
3.0 Facility Classification	 A
4.0 Emission Estimates	. 4
5.0 Applicable Requirements	. 8

Exhibits

Figure 1	Site Plan
Table 1	Emission Generating Sources
Table 2	Actual Criteria Air Pollutant Summary
Table 3	Actual Toxic Air Pollutant Summary
Table 4	Potential to Emit Criteria Air Pollutant Summary
Table 5	Potential to Emit Toxic Air Pollutant Summary

Appendixes

A IDEQ Application FormsB Actual Emission EstimatesC PTE Emission Estimates

1.0 Introduction

On behalf of Freedom Plastics, Inc., CH2M HILL has prepared a Permit to Construct (PTC) Application for an existing facility located in Preston, Idaho. The facility is located at 640 S Highway 91 in the southeastern portion of Preston in Franklin County. This application satisfies the requirements for a PTC in accordance with the Rules for the Control of Air Pollution in Idaho (IDAPA) 58.01.01.200 through 228.

Freedom Plastics, Inc. was founded in 1976 in Janesville, Wisconsin as a plastic (PVC) pipe manufacturer and currently has production facilities in Wisconsin, Florida, and Preston, Idaho. Freedom Plastics, Inc. is also a fabricator of PVC fittings that are used for a variety of residential, industrial, and commercial applications. The Freedom Plastics, Inc. facility in Preston, Idaho currently contains multiple natural gas combustion sources and volatile organic compounds (VOC) emission generating sources.

Actual emission estimates were based on the largest quantities generated from 2004 through 2007. Actual VOC emission estimates were approximately 7.6 tons per year (tpy). Therefore, Freedom Plastics, Inc. is requesting a PTC to address facility-wide PVC manufacturing operations from a variety of emission generating sources at its Preston facility as listed in Table 1.

Table 1-Emission	Generating Sources

Table 1-Emission Generating Sources					
VOC Emission Sources	Natural Gas Combustion Sources				
P-70 Primer	Glycol Tanks				
811 A-B Epoxy	Square Heaters				
AA-2304 Contact Cement	Wall Heater				
1969 Green Glue	Infrared Heaters				
711 White and Grey Glue	Forced Air Furnaces				
719 White and Grey Glue					

In order to determine compliance with VOC emissions, Freedom Plastics, Inc. is requesting permit quantity limits of 2,000 gal/yr and 1,500 gal/yr for P-70 Primer and 719 White Glue; respectively, because these two materials alone account for 90% of the actual VOC emissions.

In addition, ambient air modeling is not required because individual toxic air pollutants do not exceed the emission screening levels. This issue was discussed and mutually agreed upon in a conference call meeting held with the Idaho Department of Environmental Quality and Freedom Plastics, Inc. on April 15, 2008.

This PTC application includes: a process description, facility classification, actual and potential emission estimates, and a regulatory review.

An application fee has been included with the application submittal in accordance with IDAPA 58.01.01.226. DEQ permit application forms are provided in Appendix A.

2.0 Process Description

Freedom Plastics uses standard length PVC plastic pipe as a raw material, stockpiled outside the manufacturing building and brought into the building by forklift. Once inside, the pipe is take to the saw and cut into required lengths. If the cut pipe piece requires a drilled hole, it is taken to the router station for drilling. The pipe piece is then taken to the pulling station where it is placed on a heated pad and heated until it achieves the correct flexibility. At this time, a heated mandrel is placed inside the pipe to be pulled through the router hole.

The piece is then placed in a glycol tank at the required depth and heated for the required time according to the pipe thickness, after which it is moved to a belling station and placed on a mandrel to make either a hub or gasket end. When this process is finished, the pipe piece is taken to the trim-saw for any necessary trimming. If additional pieces need to be attached, the piece is taken to the gluing station where P-70 Primer, epoxy, and other glues listed in Table 1 are used to join the additional pieces. The finished fitting is then taken to the shipping area for quality assurance measurements. If the fitting requires a gasket, the gasket is glued in with contact cement prior to shipment.

Although the cutting, drilling, and trimming processes release small amount of particulates into the air, these are captured by a filtration system within the building and not vented outside.

3.0 Facility Classification

The Freedom Plastics facility is considered a minor source according to Federal and Idaho state regulations. The facility emits less than 100 tons per year of any regulated pollutant or combined volatile organic compounds. The site is a minor source for Hazardous Air Pollutants (HAP) with total potential aggregate HAP emissions of less than 25 tons per year and emissions of any single HAP of less than 10 tons per year.

Franklin County is classified as attainment or unclassifiable for the criteria pollutants NO_X , SO_2 , ozone, lead, and PM_{10} . There are no Class I areas within 10 kilometers of the facility.

4.0 Emission Estimates

Emission estimates were calculated based on emission factors derived from the United States Environmental Protection Agency (US EPA) Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1: Stationary Point and Area Sources, and Material Safety Data Sheets (MSDS) supplied by the facility.

Actual criteria air pollutant and toxic air pollutant estimates are presented in Table 2 and Table 3, respectively. Actual emission estimates for natural gas combustion sources are based on two shifts (day and swing). Each shift operates 40 hours per week (hr/wk). Therefore, the total annual hours of operation for the facility is approximately 4,160 hours per year. Actual emissions for chemical materials are based on largest usage quantities supplied by Freedom Plastics, Inc. for calendar years 2004 through 2007. Actual emission spreadsheets are included in Appendix B.

Table 2 - Actual Criteria Air Pollutant Emission Estimates

Point / Non-point Sources		Estimated Criteria Air Pollutants Emission Rate (ton/year)								
	PM	PM-10	NOx	SO2	ÇO	VOC				
Glycol Tanks	0.03	0.03	0.38	0.00	0.32	0.02				
Square Heaters	1.9E-03	1.9E-03	2.4E-02	1.5E-04	2.1E-02	1.3E-03				
Wall Heater	4.6E-04	4.6E-04	6.1E-03	3.7E-05	5.1E-03	3.4E-04				
Infrared Heaters	0.02	0.02	0.24	1.5E-03	0.21	0.01				
Forced Air Furnaces	0.03	0.03	0.34	2.1E-03	0.29	0.02				
Total Chemical Use	***					7.56				
Total Point Sources	0.1	0.1	1.0	0.0	0.8	7.6				
Significant Emission Rates (10%)	2.5	1.5	4.0	4.0	10.0	4.0				
Exceeds Significant Threshold?	No	No	No	No	No	Exceeds				

¹ Obtained from EPA website June 2008.

Table 3 - Actual Toxic Air Pollutant Emission Estimates

Toxic Air Pollutants ³	CAS No.		Estimated L	Incontrolled Air	Toxic Pollutant	s Emission Rate (I	b/hr)		IDAPĀ	
TONIO AM TOMARMO		Glycol Tanks	Square Heaters	Wall Heater	Infrared Heaters	Forced-Air Furnaces	Total Chemical Use	Toxic Emission Totals (lb/hr)	58.01.01.585/586 - EL (lb/hr)	PTE Emission Rate vs. EL
3-Methylchloranthrene	56-49-5	3.26E-09	2.12E-10	5.29E-11	2.12E-09	2.97E-09		8.62E-09	2.50E-06	ł
Acetone	67-64-1						2.10E-01	2.10E-01	1,19E+02	i
Benzene	71-43-2	3.81E-06	2.47E-07	6.18E-08	2.47E-06	3.47E-06		1.01E-05	1	Below
Benzo(a)pyrene*	50-32-8	2.18E-09	1.41E-10	3.53E-11	1.41E-09	1.98E-09		5.75E-09		Below
Benzoyl peroxide	91-36-0				,		1.21E-02	1.21E-02	i	Below
Cyclohexanone	108-94-1						3.22E-01	3.22E-01	l	li .
Formaldehyde	50-00-0	1.36E-04	8.82E-06	2.21E-06	8.82E-05	1.24E-04		3.59E-04	· ·	Below
Hexane	110-54-3	3.26E-03	2.12E-04	5.29E-05	2.12E-03	2.97E-03	1.68E-08	8.62E-03	i	Below
Methyl ethyl ketone	78-93-3						4.88E-01	4.88E-01	l .	Below
Methyl methacrylate	80-62-6						9.04E-02	9.04E-02	i	Below
Naphthalene	91-20-3	1.11E-06	7.18E-08	1.79E-08	7.18E-07	1.01E-06		2.92E-06	3,33E+00	Below
Pentane	109-66-0	4.72E-03	3.06E-04	7.65E-05	3.06E-03	4.30E-03		1.25E-02	•	1
Toluene	108-88-3	6.17E-06	4.00E-07	1.00E-07	4.00E-06	5.62E-06	3.59E-08	1.63E-05	1	1
Tetrahydrofuran	109-99-9						1.39E+00	1.39É+00	3,93E+01	Below
POM⁴		2.07E-08	1.34E-09	3.35E-10	1.34E-08	1.88E-08		5.46E-08	2.00E-06	Below
Toxic Air Pollutants-Metals ⁵										J 5-1
Arsenic	7440-38-2	3.63E-07	2.35E-08	5.29E-11	2.12E-09	2.97E-09		3.91E-07	1	
Barium	7440-39-3	7.98E-06	5.18E-07	6.18E-08	2.47E-06	3.47E-06		1.45E-05		1
Beryllium	7440-41-7	2.18E-08	1.41E-09	3.53E-11	1.41E-09	1.98E-09		2.66E-08	1	1
Cadmium	7440-43-9	2.00E-06	1.29E-07	2.21E-06	8.82E-05	1.24E-04		2.16E-04	1	1
Chromium	7440-47-3	2.54E-06	1.65E-07	5.29E-05	2.12E-03	2.97E-03		5.15E-03	ł.	1
Cobalt	7440-48-4	1.52E-07	9.88E-09	1.79E-08	7.18E-07	1.01E-06		1.91E-06		1
Copper	7440-50-8	1.54E-06	1.00E-07	7.65E-05	3.06E-03	4.30E-03		7.43E-03		i
Manganese	7439-96-5	6.89E-07	4.47E-08	1.00E-07	4.00E-06	5.62E-06		1.05E-05	1	
Mercury	7439-97-6	4.72E-07	3.06E-08	7.06E-10	I :	3.96E-08		5.71E-07	1	1
Molybdenum	7439-98-7	2.00E-06	1.29E-07	4.71E-10	1.88E-08	2.64E-08		2.17E-06	i	1
Nickel	7440-02-0	3.81E-06	2.47E-07	5.29E-11	2.12E-09	2.97E-09		4.06E-06	1	ı
Selenium	7782-49-2	4.35E-08	2.82E-09	5.29E-11	2.12E-09	1		5.15E-08	i	
Vanadium	1314-62-1	4.17E-06	2.71E-07	7.06E-11	2.82E-09	3.96E-09		4.45E-06	i	
Zinc	7440-66-6	5.26E-05	3.41E-06	5.29E-11	2.12E-09	2.97E-09		5.60E-0	3.33E-0	1 Below

Notes

¹ Criteria Pollutants, small uncontrolled boilers (EPA AP-42, Section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2).

² PM emission factor is assumed to equal PM₁₀.

³ Toxic Air Pollutants (EPA AP-42, Section 1.4 Natural Gas Combustion, Table 1.4-3).

⁴Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene,

benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. Designated by *

⁵ Metals from Natural Gas Combustion (EPA AP-42, Section 1.4 Natural Gas Combustion, Table 1.4-4).

Potential to emit (PTE) criteria air pollutant and toxic air pollutant estimates are presented in Table 4 and Table 5, respectively. PTE estimates for natural gas combustion sources are based on 8,760 hours per year. PTE estimates for chemical materials are based on doubling the largest usage quantities supplied by Freedom Plastics, Inc. for calendar years 2004 through 2007. PTE estimates were adjusted higher for P-70 Primer and 719 White Glue in order to establish VOC emissions below 10 tons per year.

Additionally, in order to determine compliance with VOC emissions, Freedom Plastics, Inc. is requesting permit quantity limits of 2,000 gal/yr and 1,500 gal/yr for P-70 Primer and 719 White Glue; respectively, because these two materials alone account for 90% of the VOC emissions. PTE emission spreadsheets are included in Appendix C.

Table 4 - Potential to Emit Criteria Air Pollutant Emission Estimates

	Estimated Criteria Air Pollutants Emission Rate (ton/year)									
Point / Non-point Sources	PM	PM-10	NOx	SO2	CO	voc				
Glycol Tanks	0.06	0.06	0.79	0.00	0.67	0.04				
Square Heaters	3.9E-03	3.9E-03	0.05	3.1E-04	0.04	2.8E-03				
Wall Heater	9.8E-04	9.8E-04	1.3E-02	7.7E-05	1.1E-02	7.1E-04				
Infrared Heaters	0.04	0.04	0.52	3.1E-03	0.43	0.03				
Forced Air Furnaces	0.05	0.05	0.72	4.3E-03	0.61	0.04				
Total Chemical Use						9.41				
Total Point Sources	0.2	0.2	2.1	0.0	1.8	9.5				
Significant Emission Rates (10%)	2.5	1.5	4.0	4.0	10.0	4.0				
Exceeds Significant Threshold?	No	No	No	No	No	Exceeds				

Table 5 - Potential to Emit Toxic Air Pollutant Emission Estimates

Table 5 - Potential to Emit Toxic Air Pollutant Emi			Estimated Un	controlled Air T	ovic Pollutante	Emission Rate (lb	/hr)		IDADA	
				Controlled All 1	Infrared	Forced-Air	,,,,	Toxic Emission	IDAPA 58.01.01.585/586 -	PTE Emission
	CAS No.	Glycol Tanks	Square Heaters	Wall Heater	Heaters	Furnaces	Total Chemical Use	Totals (lb/hr)	EL (lb/hr)	Rate vs. EL
Toxic Air Pollutants ³	56-49-5	3.26E-09	2.12E-10	5.29E-11	2.12E-09	2.97E-09		8.62E-09	2.50E-06	Below
3-Methylchloranthrene	67-64-1	0.202 00				<u></u>	4.19E-01	4.19E-01	1.19E+02	Below
Acetone	71-43-2	3.81E-06	2.47E-07	6.18E-08	2.47E-06	3,47E-06		1.01E-05	8.00E-04	Below
Benzene	50-32-8	2.18E-09	1.41E-10	3.53E-11	1.41E-09	1.98E-09		5.75E-09	2.00E-06	Below
Benzo(a)pyrene*	91-36-0	2.101-03					1.21E-02	1.21E-02	3.33E-01	Below
Benzoyl peroxide	108-94-1						5.56E-01	5.56E-01	6.67E+00	Below
Cyclohexanone	50-00-0	1.36E-04	8.82E-06	2.21E-06	8.82E-05	1,24E-04		3.59E-04	5.10E-04	Below
Formaldehyde		3.26E-03	2.12E-04	5.29E-05	2.12E-03	2.97E-03	1.68E-08	8.62E-03	1.20E+01	Below
Hexane	110-54-3		2.126-04	5.251-05			8.43E-01	8.43E-01	3.93E+01	Below
Methyl ethyl ketone	78-93-3						9.04E-02	9.04E-02	2.73E+01	Below
Methyl methacrylate	80-62-6		7.18E-08	1.79E-08	7.18E-07	1.01E-06	0.572 02	2.92E-06	3.33E+00	Below
Naphthalene	91-20-3	1.11E-06		7.65E-05	3.06E-03	4.30E-03		1.25E-02	1.18E+02	Below
Pentane	109-66-0	4.72E-03	3.06E-04	i I	4.00E-06	5.62E-06	3.59E-08	1.63E-05		Below
Toluene	108-88-3	6.17E-06	4.00E-07	1.00E-07	4.001-00	3.02L-00	2.37E+00	2.37E+00	1	1
Tetrahydrofuran	109-99-9							5.46E-08	1	ļ
POM⁴		2.07E-08	1.34E-09	3.35E-10	1.34E-08	1.88E-08		5.40E-08	2.00E-00	l Below
Toxic Air Pollutants-Metals ⁵							г	0.045.03	4.505.00	Below
Arsenic	7440-38-2	3.63E-07	2.35E-08	5.29E-11	2.12E-09	2.97E-09		3.91E-07	1.50E-06	1
Barium	7440-39-3	7.98E-06	5.18E-07	6.18E-08	2.47E-06	3.47E-06		1.45E-05	1	1
Beryllium	7440-41-7	2.18E-08	1.41E-09	3.53E-11	1.41E-09	1.98E-09		2.66E-08	l	
Cadmium	7440-43-9	2.00E-06	1.29E-07	2.21E-06	8.82E-05	1.24E-04		2.16E-04	1	1
Chromium	7440-47-3	2.54E-06	1.65E-07	5.29E-05	2.12E-03	2.97E-03		5.15E-03	l	1
Cobalt	7440-48-4	1.52E-07	9.88E-09	1.79E-08	7.18E-07	1.01E-06		1.91E-06	1	1
Copper	7440-50-8	1.54E-06	1.00E-07	7.65E-05	3.06E-03	4.30E-03		7.43E-03	l .	1
Manganese	7439-96-5	6.89E-07	4.47E-08	1.00E-07	4.00E-06	5.62E-06		1.05E-05	1	1
Mercury	7439-97-6	4.72E-07	3.06E-08	7.06E-10	2.82E-08	3.96E-08	1	5.71E-07		ł
Molybdenum	7439-98-7	2.00E-06	1.29E-07	4.71E-10	1.88E-08	2.64E-08		2.17E-06	1	1
Nickel	7440-02-0	3.81E-06	2.47E-07	5.29E-11	2.12E-09	2.97E-09		4.06E-06	ł	
Selenium	7782-49-2	4.35E-08	2.82E-09	5.29E-11	2.12E-09	2.97E-09		5.15E-08	ı	1
Vanadium	1314-62-1	4.17E-06	2.71E-07	7.06E-11	2.82E-09	3.96E-09		4.45E-06	1	1
Zinc	7440-66-6	5.26E-05	3.41E-06	5.29E-11	2.12E-09	2.97E-09		5.60E-05	3.33E-0	Below

Notes

¹ Criteria Pollutants, small uncontrolled boilers (EPA AP-42, Section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2).

² PM emission factor is assumed to equal PM₁₀.

³ Toxic Air Pollutants (EPA AP-42, Section 1.4 Natural Gas Combustion, Table 1.4-3).

⁴Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene,

benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. Designated by *

⁵ Metals from Natural Gas Combustion (EPA AP-42, Section 1.4 Natural Gas Combustion, Table 1.4-4).

5.0 Applicable Requirements

State and Federal Regulation Applicability

The following sections address air quality regulatory compliance requirements for the Freedom Plastics, Inc Preston facility. As detailed below, the sources comply with all applicable Idaho air quality regulations codified in IDAPA 58.01.01, as well as US EPA Code of Federal Regulations (CFR).

Federal Regulations

New Source Review (NSR) and PSD Applicability - 40 CFR Parts 51 and 52

In accordance with EPA and IDAPA 58.01.01.205 rules, the proposed facility would be required to submit a construction permit application subject to the requirements of NSR if it is determined to be a major source or a major modification. The requirements of NSR vary in two substantial ways, depending on whether the proposed facility will be located in an area that is in attainment of NAAQS.

New Source Review (NSR)

Prevention of Significant Deterioration (PSD) is the portion of NSR that applies to pollutants that are in attainment or non-attainment of NAAQS, or are unclassifiable. Franklin County is classified as attainment or unclassifiable for the criteria pollutants NO_X , SO_2 , ozone, lead, and PM_{10} . Therefore, new or modified air emission sources in Franklin County are potentially subject to PSD review for these pollutants, depending on the proposed facility's major source status and on the emission rates of NO_X , SO_2 , VOC, and PM_{10} .

A source is considered to be major if:

- 1. It is included in a list of 28 specific source categories and its potential to emit any of the NSR-regulated pollutants exceeds 100 tons per year (tpy), or
- 2. If its PTE exceeds 250 tpy for any other source category.

The Freedom Plastics, Inc. Preston facility is not one of the 28 listed source categories. In addition, the proposed facility is not expected to have a PTE greater than 250 tons per year for NO_{X} , SO_{2} , VOC, and PM_{10} . Therefore, the facility is not a major source and will not need to undergo an attainment NSR. (See Table 4 and Table 5 in Section 4.0 for PTE emission calculations).

New Source Performance Standards - 40 CFR Part 60

There are no New Source Performance Standards (NSPS) regulations that apply to the PVC plastic pipe operation at the Freedom Plastics Preston facility.

National Emission Standards for Hazardous Air Pollutants - 40 CFR Part 63

Section 112 of the Clean Air Act (CAA) Amendments relates to the release of air toxic contaminants. The requirements of CAA Section 112(g) or (j) are not applicable because the facility is not a major source of hazardous air pollutants (HAP) (40 CFR 63.40(b)). Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAPS) applies to major sources of HAP, defined as the facility's PTE greater than 10 ton per year for any single HAP or the PTE greater than 25 ton per year for total HAP. HAP emissions from the Preston facility are expected to be below these threshold amounts.

Title V Operating Permit Program- 40 CFR Part 70

The CAA requires states to develop an operating permit program (40 CFR Part 70) for major sources. As described above, the Preston facility is not a major source.

Accidental Release Prevention Program- 40 CFR Part 68

The Preston facility is not expected to use any chemicals that will make the facility subject to the Accidental Release Prevention Program.

Compliance Assurance Monitoring (CAM) - 40 CFR Part 64

The Preston facility is not expected to be subject to the CAM rule.

IDAPA Regulations

IDAPA 58.01.01.123 CERTIFICATION OF DOCUMENTS

"All documents, including but not limited to, application forms for permits to construct, application forms for operating permits, progress reports, records, monitoring data, supporting information, requests for confidential treatment, testing reports or compliance certifications submitted to the Department shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

<u>IDAPA 58.01.01.124</u> TRUTH, ACCURACY AND COMPLETENESS OF DOCUMENTS.

"All documents submitted to the Department shall be truthful, accurate and complete."

IDAPA 58.01.01.125 FALSE STATEMENTS

"No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under any permit, or any applicable rule or order in force pursuant thereto."

IDAPA 58.01.01.130

STARTUP, SHUTDOWN, SCHEDULED MAINTENANCE, SAFETY MEASURES, UPSET AND BREAKDOWN.

If an excess emission event occurs during startup, shutdown, scheduled maintenance, safety measures, upset or breakdown, the Preston facility will comply with IDAPA 58.01.01.130 through 58.01.01.136.

In the event of an upset or breakdown, the malfunctioning unit would be immediately shut down. This includes any malfunction that could create excess emissions.

IDAPA 58.01.01.156 TOTAL COMPLIANCE

"Where more than one (1) section of these rules applies to a particular situation, all such rules must be met for total compliance, unless otherwise provided for in these rules."

IDAPA 58.01.01.161 TOXIC SUBSTANCES

- 1. Glycol Tanks
- 2. Square Heaters
- 3. Wall Heater
- 4. Infrared Heaters
- 5. Forced Air Furnaces
- 6. P-70 Primer
- 7. 811 A-B Epoxy
- 8. AA-2304 Contact Cement
- 9. 1969 Green Glue
- 10. 711 White Glue
- 11. 711 Grey Glue
- 12. 719 White Glue
- 13. 719 Grey Glue

"Any contaminant which is by its nature toxic to human or animal life or vegetation shall not be emitted in such quantities or concentrations as to alone, or in combination with other contaminants, injure or unreasonably affect human or animal life or vegetation."

See Table 4 and Table 5 in Section 4.0 for the PTE emission estimates.

IDAPA 58.01.01.210 DEMONSTRATION OF PRECONSTRUCTION COMPLIANCE WITH TOXIC STANDARDS

- Glycol Tanks
- 2. Square Heaters
- 3. Wall Heater
- 4. Infrared Heaters
- 5. Forced Air Furnaces
- 6. P-70 Primer

- 7. 811 A-B Epoxy
- 8. AA-2304 Contact Cement
- 9. 1969 Green Glue
- 10. 711 White Glue
- 11. 711 Grey Glue
- 12. 719 White Glue
- 13. 719 Grey Glue

"In accordance with Subsection 203.03, the applicant shall demonstrate preconstruction compliance with Section 161 to the satisfaction of the Department. The accuracy, completeness, execution and results of the demonstration are all subject to review and approval by the Department."

See Table 4 and Table 5 in Section 4.0 for the PTE emission estimates.

IDAPA 58.01.01.220 General Exemption Criteria For Permit to Construct Exemptions

IDAPA 58.01.01.221 Category I Exemption

"No permit to construct is required for a source that satisfies the criteria set forth in Section 220 and the following:"

IDAPA 58.01.01.221.01 Below Regulatory Concern.

"The maximum capacity of a source to emit an air pollutant under its physical and operational design considering limitations on emissions such as air pollution control equipment, restrictions on hours of operation and restrictions on the type and amount of material combusted, stored or processed shall be less than ten percent (10%) of the significant emission rates set out in the definition of significant at Section 006."

Actual VOC emission estimates were approximately 7.6 tpy based on the largest quantities generated from 2004 through 2007.

<u>IDAPA 58.01.01.300</u> PROCEDURES AND REQUIREMENTS FOR TIER I OPERATING PERMITS

"The purposes of Sections 300 through 399 are to establish requirements and procedures for the issuance of Tier I operating permits."

Not applicable. The Preston facility will be classified as a minor source facility with total potential emissions less than 100 tons per year.

<u>IDAPA 58.01.01.590</u> NEW SOURCE PERFORMANCE STANDARDS

- 1. Glycol Tanks
- 2. Square Heaters
- 3. Wall Heater
- 4. Infrared Heaters
- 5. Forced Air Furnaces
- 6. P-70 Primer
- 7. 811 A-B Epoxy
- 8. AA-2304 Contact Cement

- 9. 1969 Green Glue
- 10. 711 White Glue
- 11. 711 Grey Glue
- 12. 719 White Glue
- 13. 719 Grey Glue

The proposed sources are not applicable under 40 CFR Part 60 – see compliance review in the federal summary.

IDAPA 58.01.01.591

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS

- 1. Glycol Tanks
- 2. Square Heaters
- 3. Wall Heater
- 4. Infrared Heaters
- 5. Forced Air Furnaces
- 6. P-70 Primer
- 7. 811 A-B Epoxy
- 8. AA-2304 Contact Cement
- 9. 1969 Green Glue
- 10. 711 White Glue
- 11. 711 Grey Glue
- 12. 719 White Glue
- 13. 719 Grey Glue

The proposed sources are not regulated under 40 CFR Part 61 and 40 CFR Part 63, because the Preston facility is below threshold limits.

IDAPA 58.01.01.650

RULES FOR CONTROL OF FUGITIVE DUST

The Preston facility will take all reasonable precautions to prevent the generation of fugitive dust as outlined under IDAPA 58.01.01.650-651.

IDAPA 58.01.01.775

RULES FOR CONTROL OF ODORS

The Preston facility will follow the guidelines set under IDAPA 58.01.01.775 through IDAPA 58.01.01.776 to control odorous emissions from all sources for which no gaseous emission control rules apply.

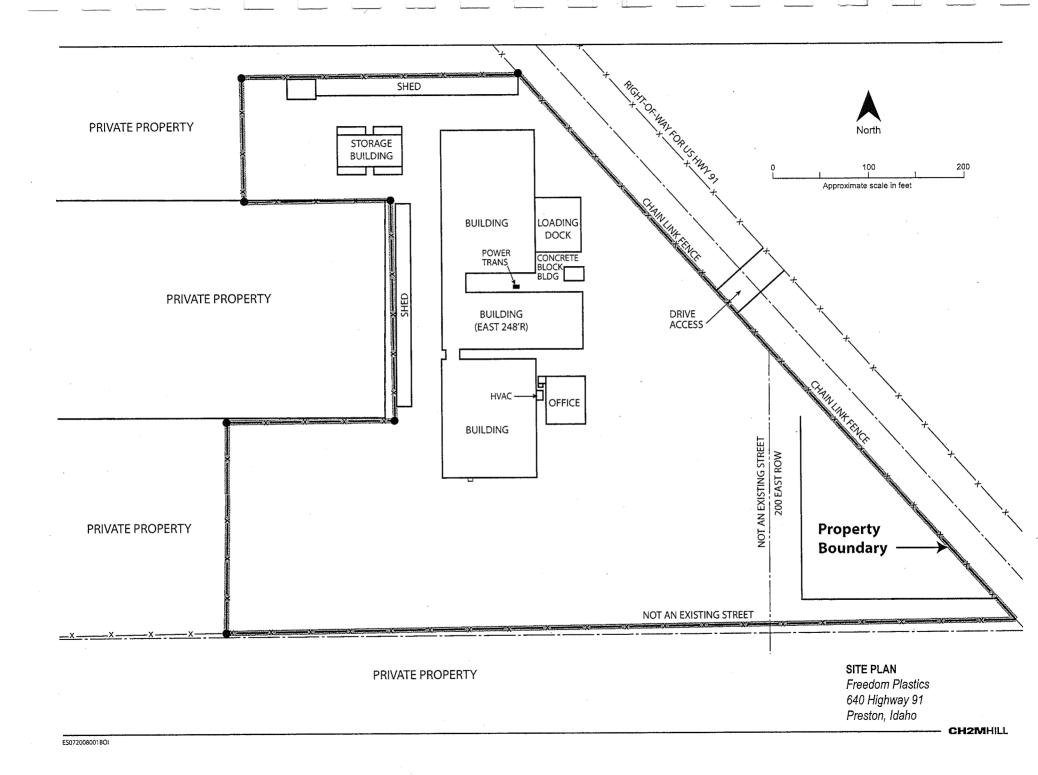
IDAPA 58.01.01.776

GENERAL RULES

IDAPA 58.01.01.776.01

General Restrictions

"No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids into the atmosphere in such quantities as to cause air pollution."



Appendix A

IDEQ Application Forms



DEQ AIR QUALITY PROGRAM

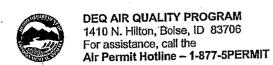
1410 N. Hilton, Boise, ID 83706
For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 2 02/13/07

		none on page 2 to each time.	—vestdakterroord						
1. Compan		NAME, FACILITY NAME, AND FACILITY ID NUMBE Freedom Plastics, Inc	K Landalah						
		Freedom Plastics, Preston, 3. Facility ID No.							
2. Facility		ID Facility							
	oject Descripence or less	otion PVC Fabricator							
- One sent	ence or less	PERMIT APPLICATION TYPE							
5. New	Facility	New Source at Existing Facility Unpermitted Existing So	urce						
		Source: Permit No.: Date Issued:							
Req	uired by Enf	orcement Action: Case No.:							
6. Mino	or PTC	Major PTC							
		FORMS INCLUDED							
Include d	N/A	Forms	DEQ Verify						
\boxtimes		Form GI – Facility Information							
\boxtimes		Form EU0 – Emissions Units General							
	\boxtimes	Form EU1 - Industrial Engine Information Please Specify number of forms attached:							
	\boxtimes	Form EU2 - Nonmetallic Mineral Processing Plants Please Specify number of forms attached:							
		Form EU3 - Spray Paint Booth Information Please Specify number of forms attached:							
	\boxtimes	Form EU4 - Cooling Tower Information Please Specify number of forms attached:							
		Form EU5 – Boiler Information Please Specify number of forms attached:							
	\boxtimes	Form HMAP – Hot Mix Asphalt Plant Please Specify number of forms attached:							
	\boxtimes	Form CBP - Concrete Batch Plant Please Specify number of forms attached:							
	\boxtimes	Form BCE - Baghouses Control Equipment							
	\boxtimes	Form SCE - Scrubbers Control Equipment							
\boxtimes		Forms El-CP1 - El-CP4 - Emissions Inventory- criteria pollutants (Excel workbook, all 4 worksheets)							
\boxtimes		PP – Plot Plan							
	\boxtimes	Forms MI1 – MI4 – Modeling (Excel workbook, all 4 worksheets)							
\boxtimes		Form FRA – Federal Regulation Applicability							

DEQ USE ONLY
Date Received
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Project Number
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Payment / Fees Included?
Yes ☐ No ☐
Check Number



Revision 2 02/13/07

Please see instructions on page 2 before filling out the form.

All information is required. If information is missing, the application will not be processed.

	IDENTIFICATION	
1. Company Name	Freedom Platics, Inc.	
2. Facility Name (if different than #1)	Mark the Control of t	
3. Facility I.D. No.		
4. Brief Project Description:	the state of the s	MANUS ASSASSAS
	FACILITY INFORMATION	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
5. Owned/operated by: (\forall f applicable)	Federal government County government State government City government	
6. Primary Facility Permit Contact Person/Title	Jeannie Bell, Environmental Manager	
7. Telephone Number and Email Address	(208) 852-2000 jeanniebell@freedomplastics.com	
8. Alternate Facility Contact Person/Title		
9. Telephone Number and Email Address		
10. Address to which permit should be sent	640 S Highway 91	
11. City/State/Zip	Preston, Idaho 83263	
12. Equipment Location Address (If different than #9)		
13. City/State/Zip		
14. Is the Equipment Portable?	Yes No	
15. SIC Code(s) and NAISC Code	Primary SIC: 3081. Secondary SIC (if any): NAICS;	
16. Brief Business Description and Principal Product	PVC Fabricator	
17. Identify any adjacent or contiguous facility that this company owns and/or operates	The second secon	
	PERMIT APPLICATION TYPE	
18. Specify Reason for Application	New Facility □ New Source at Existing Facility Modify Existing Source: □ Date Issued: Unpermitted Existing Source: □ Required by Enforcement Action: Case No.:	
	CERTIFICATION	4.7
IN ACCORDANCE WITH IDAPA 58.01.01.123 (I AFTER REASONABLE INQUIR)	RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO), I CERTIFY BASED ON INFORMATION AND BELIEF FORM Y, THE STATEMENTS AND INFORMATION IN THE DOCUMENT ARE TRUE, ACCURATE, AND COMPLETE	NED.
19. Responsible Official's Name/Title	RICKHOFFMAN PLANTENGINEER	
20. RESPONSIBLE OFFICIAL SIGNAT		
21. X Check here to indicate you would	d like to review a draft permit prior to final issuance.	



Revision 2 02/14/07

, logo oo me oo maa aa			DENTIFICATI	ON					
					Facility ID	No:			
Company Name:	A Company	Facility N	Company Company		1 acinty iD				
Freedom Plastics, Inc		Preston, ID facility							
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3. EU Type:	☐ New S	Source 🔯 ication to a Po	Unpermitted Exi- ermitted Source –	sting Source Previous Permit	#: Date Issu	ed:			
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5. Model:									
6. Maximum Capacity:	1.85 MB	TU							
7. Date of Construction:									
8. Date of Modification (if any)									
9. Is this a Controlled Emission Unit?			Strongware in the challenge waters of	e planting a Carlo Martine, in Designation and Assault	f No, go to line 18.				
	MARKY.	EMISSION	IS CONTROL	EQUIPMENT					
10. Control Equipment Name and ID:									
11. Date of Installation:			12. Date of Modi	fication (if any):					
13. Manufacturer and Model Number:									
14. ID(s) of Emission Unit Controlled:									
15. Is operating schedule different than e units(s) involved?:	mission	☐ Yes	□ No						
16. Does the manufacturer guarantee the	control	□Yes □No	(If yes, attach a	nd label manufac	turer guarantee)				
efficiency of the control equipment?				Pollutant Contro	lled				
	РМ	PM10	SO ₂	NOx	voc	СО			
Control Efficiency									
17. If manufacturer's data is not available	attach a s	eparate sheet	of paper to provid	le the control equ	ipment design specific	cations and performance data			
to support the above mentioned control e		•							
EMISSION	UNIT OF	PERATING	SCHEDULE (hours/day, h	ours/year, or oth	er)			
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19. Maximum Operation	8760 HRS/	YEAR							
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☐ Production Limit(s):									
☐ Material Usage Limit(s):									
☐ Limits Based on Stack Testing									
Other:									
21. Rationale for Requesting the Limit(s):								
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Revision 2 02/14/07

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	materia, materialistica	NS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION DUARE HEATERS							
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5. Model:									
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8. Date of Modification (if any)									
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13. Manufacturer and Model Number									
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And the state of t	Cartieffings etc. 1		JOHEDULL	(nours/day, no					
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19. Maximum Operation	8760 HRS	of all the second second second	EQUESTED L	IMITS		<u> 444.54 a. (5. 185 - 846.84 a. (5. 185 - 5. 185 - 6. 1</u>			
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☐ Production Limit(s):									
☐ Material Usage Limit(s):					4.				
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PERMIT TO CONSTRUCT APPLICATION

Revision 2 02/14/07

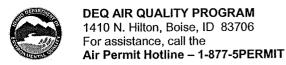
Facility Name: Facility Name: Facility Name: Preston, ID facility				IDENTIFICAT	ION					
Preston, ID facility	Company Name:		Facility	Name:	Facili	ty ID No:				
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION Emissions Unit (EU) Name:	 Test to take the control of the contro		Preston	, ID facility						
Emissions Unit (EU) Name: WALL HEATER	Brief Project Description:		PVC Fa	bricator						
2. EU ID Number: 03 3. EU Type:	EMISS	IONS U	NIT (PRO	CESS) IDENT	IFICATION &	DESCRIPTION	DN			
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PERMIT TO CONSTRUCT APPLICATION

Revision 2 02/14/07

		ID	ENTIFICATI	ON					
Company Name:		Facility Na	ame:		Facility ID No:				
Freedom Plastics, Inc		Preston, ID facility							
Brief Project Description:		PVC Fabr	icator						
	SIONS L	INIT (PROCE	SS) IDENTI	FICATION & DES	CRIPTION				
Emissions Unit (EU) Name:	CONTRACTOR OF THE PERSON NAMED IN	RARED HEATERS							
2. EU ID Number:	04								
3. ЕU Туре:	☐ New ☐ Mod	ew Source Unpermitted Existing Source lodification to a Permitted Source — Previous Permit #: Date Issued:							
4. Manufacturer:									
5. Model:									
6. Maximum Capacity:	1.2 MB	ΓU							
7. Date of Construction:			<u> </u>						
8. Date of Modification (if any)									
9. Is this a Controlled Emission Unit?	⊠ No	the first of the contract the second of	Company to asset to the contract of the contra	ollowing section. If No	, go to line 18.				
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10. Control Equipment Name and ID:									
11. Date of Installation:			12. Date of Mod	ification (if any):					
13. Manufacturer and Model Number:									
14. ID(s) of Emission Unit Controlled:									
15. Is operating schedule different than units(s) involved?:	emission	☐ Yes [□ No						
16. Does the manufacturer guarantee th	e control	□Yes □No	(If yes, attach a	and label manufacture	r guarantee)				
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Control Efficiency				, the second					
- 1 ·	e, attach a	separate sheet o	of paper to provi	de the control equipm	ent design specifications and performance da				
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19. Maximum Operation	8760 HR	S/YEAR							
		RE	QUESTED L	IMITS					
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☐ Production Limit(s):									
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☐ Limits Based on Stack Testing	Ple	ase attach all re	levant stack tes	ting summary reports					
Other:									
21. Rationale for Requesting the Limi	(s):		The same and the						



Revision 2 02/14/07

The decided metral and a page 1		IDENTIF	CATION						
Company Name:		Facility Name:		Facility ID N	lo:				
Freedom Plastics, Inc		Preston, ID facilit							
Brief Project Description:		PVC Fabricator							
	15	S UNIT (PROCESS) IDENTIFICATION & DESCRIPTION							
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2. EU ID Number:	05								
3. EU Type:	☐ New Sou	ew Source							
4. Manufacturer:									
5. Model:									
6. Maximum Capacity:	1.685 MBTU	J							
7. Date of Construction:									
8. Date of Modification (if any)									
9. Is this a Controlled Emission Unit?	⊠ No □	Yes If Yes, Complet	e the following section.	If No, go to line 18.					
	EI	VISSIONS CONT	ROL EQUIPMEN						
10. Control Equipment Name and ID:	* * * * ·								
11. Date of Installation:		12. Date of Modification (if any):							
13. Manufacturer and Model Number:									
14. ID(s) of Emission Unit Controlled:	•								
15. Is operating schedule different than em units(s) involved?:	ission	Yes ☐ No	in de la companya de La companya de la co						
16. Does the manufacturer guarantee the o	control	Yes □No (If yes, a	ttach and label manufa	cturer guarantee)					
efficiency of the control equipment?			Pollutant Cont	rolled					
- I	PM	PM10 . SO ₂	NOx	voc	CO				
Control Efficiency									
17. If manufacturer's data is not available,	attach a sepa	arate sheet of paper to	provide the control eq	uipment design specifica	tions and performance data				
to support the above mentioned control effi									
EMISSION (JNIT OPE	RATING SCHED	ULE (hours/day, l	nours/year, or othe	r)				
18. Actual Operation 4	160 HRS/YE	AR							
19. Maximum Operation 8	760 HRS/YE	AR							
		REQUEST	ED LIMITS						
20. Are you requesting any permit limits?	Yes	i □ No (If Ye	s, check all that apply b	elow)					
☐ Operation Hour Limit(s):									
☐ Production Limit(s):									
☐ Material Usage Limit(s):									
☐ Limits Based on Stack Testing	Please	attach all relevant sta	ck testing summary rep	orts					
Other:									
l	ı								

PERMIT TO CONSTRUCT APPLICATION

Revision 2 02/14/07

		TI.	DENTIFICAT	ION					
Company Name:		Facility N	lame:		Facility ID No:				
Freedom Plastics, Inc		Preston,	ID facility						
Brief Project Description:		PVC Fab	ricator						
EMIS	SIONS L	NIT (PROC	ESS) IDENT	IFICATION &	DESCRIPTION				
1. Emissions Unit (EU) Name:	The second secon	ON P-70 PRIME	The state of the s						
2. EU ID Number:	06	06							
3. EU Type:	☐ New ☐ Mod	☐ New Source ☐ Unpermitted Existing Source ☐ Modification to a Permitted Source Previous Permit #: Date Issued:							
4. Manufacturer:	IPS CO	RP							
5. Model:									
6. Maximum Capacity:									
7. Date of Construction:									
8. Date of Modification (if any)		<u>, , , , , , , , , , , , , , , , , , , </u>							
9. Is this a Controlled Emission Unit?	⊠ No				If No, go to line 18.				
· · · · · · · · · · · · · · · · · · ·		EMISSION	S CONTRO	_ EQUIPMENT					
10. Control Equipment Name and ID:			T						
11. Date of Installation:			12. Date of Mo	dification (if any):					
13. Manufacturer and Model Number:									
14. ID(s) of Emission Unit Controlled:	 								
15. Is operating schedule different than units(s) involved?:	emission	☐ Yes	☐ No						
16. Does the manufacturer guarantee the efficiency of the control equipment?	e control	□Yes □No	(If yes, attach	and label manufa	cturer guarantee)				
efficiency of the control equipment:		Pollutant Controlled							
	PM	PM10	SO ₂	NOx	voc				
Control Efficiency									
17. If manufacturer's data is not availab	e, attach a	separate sheet	t of paper to pro	vide the control eq	uipment design specifications and performance da				
to support the above mentioned control	efficiency.								
EMISSIO	N UNIT C	PERATING	SCHEDULE	E (hours/day, l	hours/year, or other)				
18. Actual Operation	4160 HR	S/YEAR	2.774						
19. Maximum Operation	8760 HR	A CONTRACTOR OF THE PARTY OF TH		ing the state of t					
		R	EQUESTED	LIMITS					
20. Are you requesting any permit lim	its? ⊠	Yes 🔲	No (If Yes, ch	eck all that apply b	pelow)				
☐ Operation Hour Limit(s):									
☐ Production Limit(s):									
		00 gal / yr							
☐ Limits Based on Stack Testing	Ple	ease attach all i	relevant stack te	esting summary re	ports				
Other:									
21. Rationale for Requesting the Limit	t(s): Th	is source is a n	najor contributo	of total VOC emis	ssions.				



PERMIT TO CONSTRUCT APPLICATION

Revision 2 02/14/07

			DENTIFICAT	ION				
Company Name:		Facility N	<u></u>		Facility I	D No:		
Freedom Plastics, Inc	jardi -	1	ID facility					
	1 N 40 1	PVC Fal						
Brief Project Description:	IONGLI	S UNIT (PROCESS) IDENTIFICATION & DESCRIPTION						
	سحم مساويها		the state of the second second					
1. Emissions Unit (EU) Name:		ON 811 A-B EI	PUX1					
2. EU ID Number:	07	lew Source ☑ Unpermitted Existing Source						
3. EU Type:		fication to a Pe	g Unpermitted Ex ermitted Source -	- Previous Permit #:	Date Is	ssued:		
4. Manufacturer:	IPS CO	₹P					-	
5. Model:				<u> </u>				
6. Maximum Capacity:								
7. Date of Construction:								
8. Date of Modification (if any)							-	
9. Is this a Controlled Emission Unit?	⊠ No		the second secon	following section. If N	lo, go to line 18.			
		EMISSION	IS CONTROL	. EQUIPMENT				
10. Control Equipment Name and ID:								
11. Date of Installation:			12. Date of Mod	lification (if any):				
13. Manufacturer and Model Number:				Andrew Commencer				
14. ID(s) of Emission Unit Controlled:								
15. Is operating schedule different than en units(s) involved?:	nission	☐ Yes	□ No					
16. Does the manufacturer guarantee the efficiency of the control equipment?	control	□Yes □No	(If yes, attach	and label manufactu	rer guarantee)		<u>.</u>	
efficiency of the control equipment:		L.c.		Pollutant Controlle	d			
	РМ	PM10	SO ₂	NOx	voc	CO		
Control Efficiency								
17. If manufacturer's data is not available,	attach a s	eparate sheet	of paper to prov	ide the control equip	ment design spe	cifications and performance da	ıta	
to support the above mentioned control ef		•						
EMISSION	UNIT O	PERATING	SCHEDULE	(hours/day, ho	urs/year, or o	other)		
	4160 HRS						19.5	
19. Maximum Operation	3760 HRS	/YEAR			SERI ON V			
	43. (7) o	and the second second	EQUESTED L	LIMITS				
20. Are you requesting any permit limits	? 🗆	Yes 🛛	No (If Yes, che	ck all that apply belo	w)			
☐ Operation Hour Limit(s):								
☐ Production Limit(s):								
☐ Material Usage Limit(s):								
☐ Limits Based on Stack Testing	Plea	ase attach all r	elevant stack tes	ting summary report	s		· .	
Other:			<u> </u>				11 101 -	
21. Rationale for Requesting the Limit(s):							



Revision 2 02/14/07

Please see instructions on page			IDENTIFICAT	TION					
Company Name:		Facility I	ayaa ka maanaa ah <u>aray ka ka ka ka ka ka ka ka ka ka</u>		Facility	ID No:			
Freedom Plastics, Inc		T	, ID facility						
Brief Project Description:		PVC Fabricator							
•	SSIONS II			IFICATION &	DESCRIPTION				
1. Emissions Unit (EU) Name:		IS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION -2304 Contact Cement							
2. EU ID Number:	08	*10							
3. EU Type:	☐ New ☐ Modi	Source [2]	☑ Unpermitted E ermitted Source	xisting Source Previous Permit	#: Date	ssued:			
4. Manufacturer:	ARROW	ADHESIVES	со						
5. Model:									
6. Maximum Capacity:									
7. Date of Construction:				4.					
8. Date of Modification (if any)									
9. Is this a Controlled Emission Unit?	⊠ No	☐ Yes If Ye	es, Complete the	following section.	If No, go to line 18				
AND THE CONTROL OF THE PARTY.		EMISSION	NS CONTRO	L EQUIPMENT					
10. Control Equipment Name and ID:									
11. Date of Installation:			12. Date of Mo	dification (if any):					
13. Manufacturer and Model Number:									
14. ID(s) of Emission Unit Controlled:					**				
15. Is operating schedule different than units(s) involved?:	emission	Yes	□ No						
16. Does the manufacturer guarantee th	e control	□Yes □N	o (If yes, attach	and label manufa	cturer guarantee)				
efficiency of the control equipment?		· · · · · · · · · · · · · · · · · · ·	· ************************************	Pollutant Contr	olled				
	РМ	PM10	SO ₂	NOx	voc	CO			
Control Efficiency									
17. If manufacturer's data is not availab	le, attach a s	eparate shee	t of paper to prov	vide the control eq	uipment design spe	ecifications and performance data			
to support the above mentioned control									
EMISSIO	O TINU V	PERATING	SCHEDULE	(hours/day, h	nours/year, or	other)			
18. Actual Operation	4160 HRS	YEAR							
19. Maximum Operation	8760 HRS.	YEAR							
		R	EQUESTED I	LIMITS					
20. Are you requesting any permit lim	its?	Yes 🛛	No (If Yes, che	eck all that apply b	elow)				
Operation Hour Limit(s):									
☐ Production Limit(s):									
☐ Material Usage Limit(s):									
☐ Limits Based on Stack Testing	Plea	se attach all ı	relevant stack te	sting summary rep	orts				
Other:									
21. Rationale for Requesting the Limit	t(s):								
<u> </u>									



PERMIT TO CONSTRUCT APPLICATION

Revision 2 02/14/07

Please see instructions on page			DENTIFICAT	ION			
Company Name:		Facility N	Name:		Facility ID	No:	
Freedom Plastics, Inc		Preston,	ID facility				
Brief Project Description:	19 (Hulla se	PVC Fal	oricator				
	SIONS L	INIT (PROC	ESS) IDENTI	FICATION & D	ESCRIPTION		
Emissions Unit (EU) Name:	1969 GI	REEN GLUE					
2. EU ID Number:	09						
3. EU Type:	☐ New ☐ Mod	Source 🗵	Unpermitted Exermitted Source -	isting Source - Previous Permit #	: Date Iss	ued:	
4. Manufacturer:	IPS CO	RP					
5. Model:							
6. Maximum Capacity:							
7. Date of Construction:							
8. Date of Modification (if any)							
9. Is this a Controlled Emission Unit?	☐ No	THE STATE OF THE S	a die Die Teks Die Broeder	ollowing section. If	No, go to line 18.		
		EMISSION	IS CONTROL	EQUIPMENT	Self-manifest in		
10. Control Equipment Name and ID:				ran da santa da sant			
11. Date of Installation:			12. Date of Mod	lification (if any):			
13. Manufacturer and Model Number:				-			
14. ID(s) of Emission Unit Controlled:							
15. Is operating schedule different than e units(s) involved?:	emission	☐ Yes	□ No				
16. Does the manufacturer guarantee the efficiency of the control equipment?	e control	□Yes □No	(If yes, attach	and label manufacti	urer guarantee)		
emolericy of the control equipment:		Pollutant Controlled					
	PM	PM10	SO ₂	NOx	voc	СО	
Control Efficiency							
17. If manufacturer's data is not available to support the above mentioned control of		separate sheet	of paper to provi	de the control equip	oment design specif	ications and performance data	
EMISSION	UNIT O	PERATING	SCHEDULE	(hours/day, ho	ours/year, or ot	ner)	
18. Actual Operation	4160 HRS						
19. Maximum Operation	8760 HRS	SYEAR					
		RI	EQUESTED L	.IMITS			
20. Are you requesting any permit limit	is? 🔲	Yes ⊠ l	No (If Yes, che	ck all that apply belo	ow)		
☐ Operation Hour Limit(s):							
☐ Production Limit(s):				-			
☐ Material Usage Limit(s):							
☐ Limits Based on Stack Testing	Ple	ase attach all r	elevant stack tes	ting summary repor	ts		
Other:							
21. Rationale for Requesting the Limit	(s):						



Revision 2 02/14/07

, rouse ose men usuene on page			IDENTIFICAT	ION					
Company Name:		Facility			Facility I	ID No:			
Freedom Plastics, Inc		1 -	, ID facility						
Brief Project Description:		PVC Fabricator							
	SIONS L	INIT (PRO	CESS) IDENT	IFICATION & D	ESCRIPTION				
Emissions Unit (EU) Name:	Material Constitution	LD-ON 711 WHITE GLUE							
2. EU ID Number:	10								
3. EU Type:		New Source							
4. Manufacturer:	IPS CO	RP							
5. Model:									
6. Maximum Capacity:									
7. Date of Construction:									
8. Date of Modification (if any)									
9. Is this a Controlled Emission Unit?	⊠ No	☐ Yes If Ye	es, Complete the	following section. If	No, go to line 18.				
10. Control Equipment Name and ID:		EMISSION	NS CONTROL	EQUIPMENT					
11. Date of Installation:			12. Date of Mod	lification (if any):					
13. Manufacturer and Model Number:									
14. ID(s) of Emission Unit Controlled:									
15. Is operating schedule different than equnits(s) involved?:		☐ Yes	□ No						
16. Does the manufacturer guarantee the efficiency of the control equipment?	control	□Yes □No	o (If yes, attach	and label manufact	urer guarantee)				
			1	Pollutant Control	led				
·	РМ	PM10	SO₂	NOx	VOC	СО			
Control Efficiency									
17. If manufacturer's data is not available		eparate sheet	t of paper to provi	de the control equip	oment design spec	ifications and performance data			
to support the above mentioned control e				a a constituit a trade di la constituit de	en roma a roma francisco com a v	Selfation (September 1985) and a company of the color			
			SCHEDULE	(hours/day, ho	ours/year, or o	tner)			
	4160 HRS								
19. Maximum Operation	8760 HRS								
			EQUESTED L	and the control of the second post of					
20. Are you requesting any permit limits	? 🔲	Yes ⊠⊺	No (If Yes, ched	k all that apply belo	ow)				
Operation Hour Limit(s):									
☐ Production Limit(s):			<u> </u>						
☐ Material Usage Limit(s):									
☐ Limits Based on Stack Testing	Plea	se attach all r	elevant stack test	ing summary repor	ts				
Other:									
21. Rationale for Requesting the Limit(s	i):								



Revision 2 02/14/07

Please see instructions on pag	G Z DGIOLE		IDENTIFICAT	TION		
Company Name:		Facility	and the distance of the same and the first same and the s		Facility ID	No:
Freedom Plastics, Inc		1	the second second		T actity ib	
		Preston, ID facility PVC Fabricator				
Brief Project Description:	Nasa kasalan an ta analaki k					
EM	8900000 <u></u>		A CONTRACTOR OF THE PROPERTY O	IFICATION (& DESCRIPTION	
Emissions Unit (EU) Name:	WELD-	ON 711 GREY	/ GLUE			
2. EU ID Number:	11	· · · · · · · · · · · · · · · · · · ·				
3. EU Type:			☑ Unpermitted E. Permitted Source		nit #: Date Iss	ued:
4. Manufacturer:	IPS Cor	р				
5. Model:						
6. Maximum Capacity:						
7. Date of Construction:						
8. Date of Modification (if any)			·	a di ja		
9. Is this a Controlled Emission Unit	^o ⊠ No	☐ Yes If Ye	es, Complete the	following sectio	n. If No, go to line 18.	artina de la companya del companya de la companya del companya de la companya de
Maria et al (Sagaria		EMISSION	NS CONTROL	_ EQUIPMEN	JT The second of the secon	
10. Control Equipment Name and ID:						
11. Date of Installation:			12. Date of Mo	dification (if any):	
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different that units(s) involved?:	n emission	☐ Yes	☐ No			
16. Does the manufacturer guarantee	the control	□Yes □N	lo (If yes, attach	and label manu	facturer guarantee)	
efficiency of the control equipment?				Pollutant Cor	<u> </u>	
	PM	PM10	SO ₂	NOx	voc	CO
Control Efficiency						
17. If manufacturer's data is not availa	hle attach a	senarate shee	t of paper to prov	ide the control e	equipment design specifi	cations and performance data
to support the above mentioned control		scparate srice	. Cor paper to prov	ido trio control c	quipmont doorgii op com	·
		PERATING	SCHEDULE	(hours/day.	hours/year, or oth	ner)
18. Actual Operation	4160 HRS	<u>erik en i 1888 benede</u>				
19. Maximum Operation	8760 HRS					
10. Maximum Operation	0.001110		EQUESTED I	IMITS		
20. Are you requesting any permit lin	nits?		and the manufacture of the community of	ck all that apply	pelow)	
Operation Hour Limit(s):						
Production Limit(s):						
Material Usage Limit(s):						
	a Dia	aco attach all	relevant stack tes	ting cummany r	anorte	
Limits Based on Stack Testin	y Plea	ase auduli dli l	reievant Stack tes	sung summary te	aporto	
Other:						
21. Rationale for Requesting the Lim	nit(s):		<u> </u>			



PERMIT TO CONSTRUCT APPLICATION

Revision 2 02/14/07

			IDENTIFICA'	TION					
Company Name:		Facility	Name:		Fa	cility ID No:			
Freedom Plastics, Inc		Preston	, ID facility				Bar Kira		
Brief Project Description:		PVC Fa	bricator						
EMISSI	ONS UN	NIT (PRO	CESS) IDENT	FIFICATION &	DESCRIP'	TION			
Emissions Unit (EU) Name:	WELD-OI	v 719 WHITI	E GLUE						
2. EU ID Number:	12	그렇게 그렇다는 그렇는 사람들을 하는 아이들은 사람들이 가는 모다는 사람							
3. EU Type:	☐ New S ☐ Modifie	ource ∑ cation to a P	☑ Unpermitted E ermitted Source	xisting Source Previous Permit	#:	Date Issued:			
4. Manufacturer:	IPS Corp		- 1						
5. Model:									
6. Maximum Capacity:			1184						
7. Date of Construction:									
8. Date of Modification (if any)				1					
9. Is this a Controlled Emission Unit?	E 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	elim		following section.		ne 18.			
		EMISSION	NS CONTRO	L EQUIPMENT	建筑建筑				
10. Control Equipment Name and ID:									
11. Date of Installation:		12. Date of Modification (if any):							
13. Manufacturer and Model Number:									
14. ID(s) of Emission Unit Controlled:	:								
15. Is operating schedule different than emisunits(s) involved?:	ssion	LET TES ES INO							
16. Does the manufacturer guarantee the conficiency of the control equipment?	ontrol [□Yes □N	o (If yes, attach	and label manufac	cturer guarar	tee)			
emolerity of the control equipment.				Pollutant Contr	olled				
P	м	PM10	SO ₂	NOx	VOC		co		
Control Efficiency		•							
17. If manufacturer's data is not available, a	ttach a se	parate shee	t of paper to pro	vide the control equ	uipment desig	gn specifications and p	erformance data		
to support the above mentioned control effic									
EMISSION U	NIT OP	ERATING	SCHEDULE	(hours/day, h	ours/year	, or other)	经自己的基础的编		
18. Actual Operation 41	60 HRS/\	/EAR							
19. Maximum Operation 87	60 HRS/\	/EAR	To the file. By the seek higher						
		R	EQUESTED	LIMITS					
20. Are you requesting any permit limits?	⊠Y	es 🔲	No (If Yes, ch	eck all that apply be	elow)				
☐ Operation Hour Limit(s):									
☐ Production Limit(s):									
☑ Material Usage Limit(s):	1500 GAL / YR								
☐ Limits Based on Stack Testing	Pleas	se attach all i	relevant stack te	sting summary repo	orts				
Other:		•							
21. Rationale for Requesting the Limit(s):	This	source is a n	najor contributor	to total VOC emiss	ions.				



PERMIT TO CONSTRUCT APPLICATION

Revision 2 02/14/07

riease see instructions on page 2	BOTOTO		IDENTIFICAT	TON.						
Company Name:	Facility	a a garaga, ya ta asa da da 18 di santan Milita (18	non-	Facility ID No						
Company Name: Freedom Plastics, Inc	_ 1	, ID facility	11 14414	T acinty ID IVC	, Projektali in Nobel					
Brief Project Description:		PVC Fa	A							
		##	CESS) IDENT	IFICATION 8	DESCRIPTION					
Emissions Unit (EU) Name:	-	EY GLUE								
2. EU ID Number:	13									
3. EU Type:	Source 🔲 Unpermitted Existing Source fication to a Permitted Source Previous Permit #: Date Issued:									
4. Manufacturer:	IPS CO	RP								
5. Model:					The second secon					
6. Maximum Capacity:										
7. Date of Construction:										
8. Date of Modification (if any)										
9. Is this a Controlled Emission Unit?	⊠ No	CONTRACTOR CONTRACTOR		armania – attionista – i	. If No, go to line 18.					
		EMISSION	NS CONTROL	_ EQUIPMEN	Tona ite and a					
10. Control Equipment Name and ID:										
11. Date of Installation:		12. Date of Modification (if any):								
13. Manufacturer and Model Number:										
14. ID(s) of Emission Unit Controlled:					and the second s					
15. Is operating schedule different than emunits(s) involved?:	ission	☐ Yes ☐ No 10 10 10 10 10 10 10 10 10 10 10 10 10								
16. Does the manufacturer guarantee the efficiency of the control equipment?	control	☐Yes ☐No (If yes, attach and label manufacturer guarantee)								
emiciency of the control equipment:		Pollutant Controlled								
	РМ	PM10	SO ₂	NOx	voc	СО				
Control Efficiency										
17. If manufacturer's data is not available,	attach a s	eparate shee	t of paper to prov	ide the control e	quipment design specification	ons and performance data				
to support the above mentioned control eff										
EMISSION	JNIT OI	PERATING	SCHEDULE	(hours/day,	hours/year, or other					
18. Actual Operation 4	160 HRS	YEAR								
19. Maximum Operation 8	760 HRS	YEAR								
		R	EQUESTED L	LIMITS						
20. Are you requesting any permit limits?	· 📙	Yes ⊠	No (If Yes, che	ck all that apply	pelow)					
Operation Hour Limit(s):		· · · · · · · · · · · · · · · · · · ·								
☐ Production Limit(s):										
☐ Material Usage Limit(s):										
Limits Based on Stack Testing	Plea	se attach all r	elevant stack tes	ting summary re	ports					
Other:										
21. Rationale for Requesting the Limit(s)										

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TANK DE		

DEQ AIR QUALITY PROGRAM

1410 N. Hilton, Boise, ID 83706 For assistance, call the Air Permit Hotline - 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 2 2/14/2007

Company Name: Facility Name:

e: Freedom Plastics, Inc

Preston, Idaho

Facility ID No.:
Brief Project Description:

PVC Fabricator

	2.	PM₁	<u>. </u>	SO ₂		NO _x		co		VO		Lead	
1. Emissions units	Stack ID	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
	Rody Williams Republic	Angert Jason	i ana in mod		Point Sou								
Glycol Tanks	Glycol	0.01	0.06	0.00	0.00	0.18	0.79	0.15	0.67	0.01	0.04		
Square Heaters	Square	0.00	0.00	0.00	0.00	0.01	0.05	0.01	0.04	0.00	0.00		eria Li erresi
Wall Heater	Wall	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00		
nfrared Heater	Infrared	0.01	0.04	0.00	0.00	0.12	0.52	0.10	0.43	0.01	0.03		
Forced Air Furnaces	Forced	0.01	0.05	0.00	0.00	0.17	0.72	0.14	0.61	0.01	0.04		
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									Service Difference				
		A Section 1									Colored Color	13266 N 152 N 158	
						2000 共產黨							
Total		0.03	0.15	0.00	0.01	0.49	2.09	0.40	1.76	0.03	0.11		<u> </u>

	DEQ AIR QUALITY	PROGRAM							PE	RMIT TO	CONSTRU	CT APPL	CATION Revision 1
	1410 N. Hilton, Bois For assistance, call	se, ID 83706 the Air Permit		•									1/11/2007
Carrany Name:	Hotline - 877-5PEF Freedom Plastics, I			1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1				1.3					
Company Name: Facility Name:	Freedom Flastics, i	110				Pre	eston, Idaho			STATE OF			
Facility ID No.:					Section 198								
Brief Project Description:	PVC Fabricator			ing programme		ana hafara fillin	a out the form			<u>1, 11</u>			
	CLIMAN	ADV OF EAC	Plea	se see instruct	ions on next pa	R CRITERIA	ng out the form. A POLLUTA	NTS - FUGI	TIVE SOUR	CES	ger geskepter specie	cherishieur (d.	4.65020038888
	SUMIMA	ART OF FAC	JILIII VVIDE	Limoolor			3						
1.	2.	PN	110	SC	O_2	NC		CO		VO		Lead	
Fugitive Source Name	Fugitive ID	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
	t gjarjagjar kom			(1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	Fugitive So	ource(s)				1.05	4.59	engra, em o	
P-70 Primer	Primer										0.00		
811 A-B Epoxy	Ероху		6							0.00	San Constitution of the Co		
AA-2304 Contact Cement	Contact									NL	NL 0.50		
1969 Green Glue	1969Green					¥,				0.13	0.58		
711 White Glue	711White					ery e				80.0	0.34		
711 Grey Glue	711Grey									0.02	0.07		
719 White Glue	719White									0.10	0.45		
719 Grey Glue	719Grey									0.77	3.38		
	2				-7.4.								
							77.2						
											40.00		Lander Control
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		Errania.							SEPTEMBER 1	and the second			
		Mary Manager									# 1		
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Note: NL=Not listed on MSDS											1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
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Instructions for Form El-CP2

Total

2.15

9.41



PERMIT TO CONSTRUCT APPLICATION

Revision 2 02/14/07

	IDENTIFICATIO	N		
Company Name:	Facility Name:			Facility ID No:
Freedom Plastics, Inc.	Freedom Plasti	ics, Preston, ID facility		
Brief Project Description: PVC Fabricator			1	
APPLIC	ABILITY DETE	RMINATION		
1. Will this project be subject to 1990 CAA Section 112(g)?	⊠ NO	☐ YES		
(Case-by-Case MACT)		* If YES then applicant must su case MACT determination [IAC		
Will this project be subject to a New Source Performance Stan (40 CFR part 60)	dard?	⊠ NO	☐ YES	*
(10 01 11 11 11 11 11 11 11 11 11 11 11 1		*If YES please identify sub-part	<u> </u>	,
3. Will this project be subject to a MACT (Maximum Achievable C regulation?	Control Technology)	⊠ NO	☐ YES	*
(40 CFR part 63)		*If YES please identify sub-part	! <u> </u>	
THIS ONLY APPLIES IF THE PROJECT EMITS A HAZARDOUS AIR POLLU	TANT			
4. Will this project be subject to a NESHAP (National Emission S Hazardous Air Pollutants) regulation? (40 CFR part 61)	tandards for	NO ★If YES please identify sub-part	☐ YES	*
5. Will this project be subject to PSD (Prevention of Significant D (40 CFR section 52.21)	eterioration)?	⊠ NO	☐ YES	
6. Was netting done for this project to avoid PSD?		☑ NO *If YES please attach netting ca	☐ YES alculations	
IF YOU ARE UNSURE HOW TO ANSWER ANY	OF THESE QUE 1-877-5PERMI		ERMIT H	OTLINE AT

Appendix B

Actual Emission Estimates